From:	Fitz-James, Schatzi
To:	Coltrain, Katrina; Turner, Philip; Atkins, Blake
Cc:	Meyer, John; Newton, Heather; Burgess, Michele; Poore, Christine; Jefferson, Matthew
Subject:	Wilcox Oil Company Lead Consultation
Date:	Friday, February 9, 2018 1:55:08 PM

Hi Katrina, Phil and Blake:

This email responds to your request for a consultation with Headquarters per the December 22, 2016 Memorandum, "Updated Scientific Considerations for Lead in Soil Cleanups" (OLEM Directive 9200.2-167).

The Wilcox Oil Company Superfund Site is a former oil refinery located in Bristow, Oklahoma. The property, which is zoned for residential and agricultural use, drains directly to two perennial waterbodies. The current residential land and surface water uses are not expected to change. Region 6 conducts frequent community meetings and has met with individual residents in the area. Media are interested and report on site progress frequently.

A remedial investigation is underway. The screening level risk assessment indicates that the lead additive area (source area) poses a direct contact risk to current field personnel. The source area also serves as a continual source for the migration of lead to surface water and sediment. The maximum lead concentration, 55,049 milligrams per kilogram (mg/kg), detected in the source area exceeded the background concentration of 5-10 mg/kg. The majority of the elevated lead is present at the surface to a depth of 2 feet below ground surface (bgs). A maximum lead sediment concentration of 117 mg/kg was detected within Sand Creek. There appear to be no other potential contaminants of concern collocated with the lead in the source area. Neither groundwater nor drinking water at the site appear to be impacted by lead; however, lead was detected in a temporary piezometer at a maximum concentration of 752 micrograms per liter.

Region 6 is proposing a limited scope interim action to address the elevated levels of lead in the source area. The proposed action level for lead is 400 mg/kg. Approximately 6,500 cubic yards of source material will be excavated to a depth of 2 feet bgs and disposed offsite at a Resource Conservation and Recovery Act Subtitle D facility. The source area covers approximately 2 acres of the 150-acre site. Quality assurance sampling will be conducted at the base and sides of the excavation. Region 6 anticipates that within the source area footprint all source material above the action level will be removed and disposed offsite. The excavation area will be graded for drainage and erosion control. The excavation area may be backfilled with clean soil to maintain proper drainage and erosion control based on the final excavation depth. All soil outside of the source area will be addressed under the final site-wide Record of Decision (ROD). Region 6 may need to reevaluate this action based on the baseline human health/ecological risk assessment that will define the lead preliminary remediation goals and/or final cleanup levels for the site.

Based on the information the Region provided and discussions to date, OSRTI agrees with the Region's proposed approach for proceeding with an interim action ROD for the lead additive area.

Thank you for coordinating with us prior to finalizing the proposed plan. Please contact Heather Newton or Christine Poore if you have any questions.

Schatzi

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